Ninfield Design Guide Reg. 14.

General Points

It is clear that an attempt has been made to respond to our previous comments, particularly in the early sections, and that the guide has been made more locally specific, with the use of local examples and photos. There is a good, detailed section on national design guidance. However, the Guide from page 22 onwards is still heavily reliant on the High Weald AONB Housing Design Guide with large tracts of text and all of the headings taken from it. Whilst understanding that the High Weald AONB Guide is a detailed, recent, design document, it covers a wide area and more work is needed to make your guide locally specific.

It is debateable whether the High Weald AONB Guide should be referenced at all, given the majority of the parish is outside the AONB but I note you do argue your case for using it on page 7. This would not however justify copying the guide verbatim. Have you discussed and shared the Design Guide with the AONB unit? They may have dealt with similar situations where part of the Parish is in the AONB and part is outside.

Generally, it would be helpful for points to have further justification. For example, if the guide states that dwellings should be no more than two storey in Ninfield then it needs to be justified/ explained why. The Character Appraisal and photos can be used as evidence to support the guidelines. You have started to do this but you need to justify each point. For example, on page 38 you have a guideline stating 'characteristic of Ninfield, in addition to full height brick buildings, are tile-hung buildings' yet your photos of tile hung buildings in the village, which would help to provide justification for the guideline, are on page 18.

Once the design guide starts on page 22 you need an introduction to each topic area rather than just a list of bullet points. This needs to explain what the bullet points are. Are they what new development proposals should do? I.e. all new development should….or all new development including extensions to existing buildings should….or some guidelines for landscaping on new developments are…..or as part of new developments we would like to see…

The guide is quite Ninfield centric but there are other settlements within the parish that need to be included. Also there is much rural hinterland with scattered farms etc.

Consider the use of paragraph numbers, and/ or numbering each guideline under each heading e.g. i, ii, iii, iv. This will make it much easier later on to reference the guide.

Number plates should be obscured throughout.

Notwithstanding the general points made above about the duplication of the High Weald AONB Housing Design Guide and the need to be locally specific, we have still made comments on the Ninfield Design Guide in order to provide what we hope is helpful advice.

Specific Points

Page	Comment	Suggested Change/ Recommendation
	The contents page is quite long at two pages.	The contents page could be condensed.
3	'It is also known for its c17th iron stocks but these are an insignificant feature.' The stocks are Listed so I am not sure they can be called insignificant.	Re phrasing necessary
3	The opening paragraph does not relate directly to the aim of the guide	Consider moving either after the second paragraph or later in the document.
4	'High Weald national character area'	High Weald **N**ational **C**haracter **A**rea
5	'However, this has not been adopted by WDC as supplementary planning guidance because of the absence of any associated policy in an up-to-date Local Plan' We may not have adopted the document but it has been published and officers do refer to it and use it. It's still a material consideration. The fact the Local Plan is out of date makes no difference to whether we adopt the document or not.	This section needs to be re-written.
	'5-year supply of housebuilding land'	Inability to meet the Council's 5 year housing land supply requirement
	'The village development area is out-of-date so several of these large housing estates have been permitted ' Do you mean development boundary? Also, this section is inaccurate. Development boundaries are still in place and are not the reason that housing estates have been permitted-	This section needs to be re-written.

Page	Comment	Suggested Change/ Recommendation
	has more to do with the housing land supply issues in the District.	
7	The Joint Advisory Committee published a 'High Weald Housing Design Guide' for new housing in 2019	…for new housing **in the AONB** in 2019
7	You need to make it clear when you are quoting from the High Weald Design Guide e.g. in paragraph 4	References should be clear, ideally using the Harvard system or footnotes but whichever method is used the referencing should be consistent.
11	'Church Path, as an historic route, is a heritage asset'	This needs further explanation. A path cannot be a non-designated heritage asset on its own. It needs to be part of a wider identified area and would be a contributing feature.
	The Design Guide	
22	'Consider the impact not only on designated heritage assets, such as Listed Buildings, but also on non-designated heritage assets such as other historic buildings and areas, features including routeways, banks, ditches, hedges, woods, trees and field patterns.'	Needs to also refer to the setting of heritage assets by name. Consider splitting this into 2 and having a separate group of guidelines for 1.heritage assets/ works affecting heritage assets and 2.biodiversity assets.
30	'Where required (see Validation requirements on Wealden.gov.uk website), include ongoing management proposals for the open space and habitats as part of a Landscape and Ecological Management Plan (to be included in the planning application)'. These are not required on every type of application, see the validation criteria on our website. The validation criteria will determine whether they are required or not, also, sometimes they are required by condition, post decision.	Consider rewording or removing as our validation criteria already covers this.

Page	Comment	Suggested Change/ Recommendation
37	'Use the detailed High Weald colour study' Is this too prescriptive bearing in mind that most of the houses in the parish are outside of the AONB?	This guideline needs to be reconsidered. The title of the study is the High Weald **AONB** colour study.
38	'The local vernacular is best reinforced by using small module clay tiles with a camber closely resembling traditional hand-made tiles so as to avoid an entirely flat surface'	Too prescriptive. The local vernacular includes a wide range of materials and for roofing this would also include traditional slates,
38	Sustainable Building Design. At the moment parts of this paragraph sound like a policy rather than design guidelines.	Consider re-wording e.g. as part of new schemes we would like to see……
39	Signage and Lighting. There is some duplication here with your dark skies policy, are both needed?	

Going Forward

It would be of great benefit for you to look at what other parishes have done in their Design Guides e.g. Battle, Ilminster, Eye, Chiddingfold. The Little Shelford Design Guide is a good example of how the guidelines have stemmed from the character analysis including photos. They all have certain things in common;

- They use their introduction to set out aims for the Design Guide.
- They use an analysis of the existing settlement to ascertain what are the key elements that form the local distinctive character e.g. in terms of pattern and layout of buildings, building height, key architectural details, materials (I note the Conservation Officer gave you some key characteristics in our previous advice to you) and that the community most value. You have already carried out some of this work in the village character assessment.
- They then use this to create the guidelines for how new development should enhance the existing character, often using photographic examples of both good and bad design to demonstrate this. The guidelines should stem from the evidence rather than be pre formed and finding the evidence to fit.

- Both the photographic examples and the supporting text to each guideline should justify why a guideline is included.

- There is usually some form of public engagement.